

THE KLEIN & CARDALI LAW GROUP, PLLC

39 Broadway, 35th Floor

New York, New York, 10006

Telephone: 212-344-9022 / 212-964-3855

Fax: 212-344-0301 / 212-634-4856

June 13, 2024

Judge Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: 24-cv-1855-AS
Tepepa et al v. The Ribbon Worldwide 44 LLC et al

Your Honor:

This firm serves as co-counsel (along with Mr. Jeffrey Goldman) to Plaintiffs in the above matter. Per your instructions for the pre-trial conference scheduled for June 24, 2024, the parties met and conferred today to discuss possible settlement and other scheduling matters.

At this time, the parties jointly request a settlement conference be held with Magistrate Judge Aaron, as we believe it would be beneficial to possible resolution of this matter. If Judge Aaron's schedule does not permit time for a settlement conference, we would alternatively request a referral to the SDNY mediation panel.

Given that the parties have begun preliminary settlement discussions, including providing initial damage calculations and relevant payroll documents, we would additionally request the June 24 pre-trial conference be adjourned and the Court not set a discovery schedule while the parties attempt to resolve this matter.

We thank the Court for its consideration of this request.

Sincerely,

/s/ Darren Rumack
Darren Rumack

c.c. Jeffrey Goldman (via ECF) Attorney for Plaintiffs
Michael Yim (via ECF) Attorney for Defendants

Application granted in part. By separate order, the Court will refer this matter for settlement. But it is not this Court's practice to delay proceedings for the purpose of settlement discussions. As such, the Court will not adjourn the initial pretrial conference. If the Case Management Plan submitted on June 20, 2024, is acceptable the Court, the Court may adjourn the conference at that time. The parties are reminded that they can choose to consent to the jurisdiction of the magistrate judge at any time (<https://www.nysd.uscourts.gov/forms/consent-proceed-us-magistrate-judge>).

The Clerk of Court is directed to terminate the motion at Dkt. 19.



Arun Subramanian, U.S.D.J.

Date: June 14, 2024